

### **REMARKS**

The Office Action dated October April 19, 2006, has been received and carefully noted. The above amendments to the specification and claims, and the following remarks are submitted as a full and complete response thereto.

Claims 31, 42, 49 and 55 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 34, 44 and 57 have been cancelled. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 31-33, 35-43, 45-56 and 58-63 are submitted for consideration.

Claims 34, 37, 39, 41, 44, 48, 51-54, 57 and 61-63 were objected to as being dependent on a rejected base claims, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 34, 44 and 57 have been cancelled and claims 31, 42, 49 and 55 have been amended to include the limitations of claims 34, 44 and 54. Therefore, claim 31 is now claim 34 in independent form, claim 42 is now claim 44 in independent form and claim 55 is now claim 57 in independent form. Based on the amendments to claims 31, 42, 49 and 55, Applicant submits that claims 31, 42, 49 and 55 should be allowed and that claims 32-33, 35-41, 43-48, 50-54, 56-63 be allowed at least for their dependence on claims 31, 42, 49 and 55.

Claims 31-33, 35-36, 38, 40, 43-43, 45-47, 49-50, 55-56 and 58-60 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,424,638 to Ray in

view of U.S. Patent No. 6,882,844 to Keski-Heikkilä. According to the Office Action, Ray teaches all of the elements of claims 31-33, 35-36, 38, 40, 42-43, 45-47, 49-50, 55-56, and 58-60 except for teaching using a cell identity information structure of a second telecommunication network. Thus, the Office Action combined the teachings of Ray and Keski-Heikkilä to yield all of the elements of claims 31-33, 35-36, 38, 40, 42-43, 45-47, 49-50, 55-56, and 58-60. Applicant requests withdrawal of the rejection for the reason outlined below.

Based on the amendments to each of claims 31, 42, 49 and 55, as noted above, Applicant submits that all of claims 31-33, 35-36, 38, 40, 42-43, 45-47, 49-50, 55-56, and 58-60 should now be allowable because all of claims 31-33, 35-36, 38, 40, 42-43, 45-47, 49-50, 55-56, and 58-60 now recite subject matter which has already been indicated as being allowable. Specifically, as acknowledged in the Office Action, all of claims 31-33, 35-36, 38, 40, 42-43, 45-47, 49-50, 55-56, and 58-60 now recite the limitations of cancelled claims 34, 44 and 57, which were indicated as containing allowable subject matter. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §103(a) should be withdrawn.

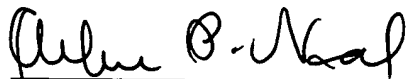
As noted previously, claims 31-33, 35-43, 45-56 and 58-63 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 31-33, 35-43, 45-56 and 58-63 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in

condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for a One -Month Extension of Time  
Check No. 14884